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June 6, 2008

VIA ECFS & COURIER

The Honorable Kevin J. Martin
Federal Communications Commission
Room 8-B201
445 12th Street, S.W.
Washington, D.C. 20554

**Re: KBHC's Application For Review of the Transfer of Three Toll Free
Suicide Prevention Numbers -- WC Docket No. 07-271, CC Docket
No. 95-155**

Dear Chairman Martin:

The Kristin Brooks Hope Center ("KBHC") writes to further update the record regarding its financial and technological capability to operate 1-800-SUICIDE, 1-888-SUICIDE, and 1-877-SUICIDA ("the suicide prevention hotlines"), numbers it established more than eight years ago to help people in crisis, and now being temporarily operated by the Substance Abuse and Mental Health Services Administration ("SAMHSA"). KBHC is pleased to inform the Commission that KBHC and AT&T recently have resolved their billing dispute; this settlement brings to a close the only significant contingent liability of KBHC. With this development, the record in this proceeding clearly demonstrates that no impediments exist to the return of the suicide prevention hotlines to KBHC. KBHC is now debt free, its settlement with AT&T eliminating its last significant liability. Furthermore, as KBHC has previously informed the Commission, KBHC has entered into service agreements with Heartbeat International, Care Net, and the Option Line to obtain telephony service for all of its lines, including the three temporarily reassigned suicide prevention hotlines. As a demonstration of its financial strength, KBHC has prepaid Option Line for 12-months of service for all of its numbers. In addition, KBHC's consistent track record of successful fundraising ventures ensures that it will be able to operate all of its numbers indefinitely.

The Honorable Kevin J. Martin
June 6, 2008
Page Two

1. KHBC Has Resolved All Outstanding or Overdue Obligations

KHBC no longer has any significant unresolved debts or liabilities. As discussed in the introduction to this letter, KBHC recently entered into a final settlement agreement with AT&T that settles all claims between the two companies. Further, as discussed in KBHC's previous communications with the Commission, KBHC resolved all of its payment disputes with Patriot Communications in January 2007. Thus, the Commission need no longer fear that an adverse judgment against KBHC would threaten the operation of any of KBHC's toll free hotlines, including the suicide prevention hotlines. KBHC finances are strong, and nothing now in the record indicates otherwise. As such, the Commission has no basis for determining that KBHC is fiscally unfit to operate the suicide prevention hotlines it founded more than ten years ago, and the Commission should therefore order the numbers returned to KBHC.

2. KHBC Has Standing Arrangements with Service Providers to Begin Routing Suicide Prevention Hotline Traffic

KBHC has entered into an agreement with other, larger charitable organizations, Heartbeat International, Care Net, and the Option Line, to obtain telephony transport and routing services for all of its toll free crisis numbers, including the suicide prevention hotlines.¹ The contract between KBHC and Option Line provides for Option Line to supply telephony transport and routing services for all KBHC numbers, along with use of Option Line's iCarol call center management tools.

To assuage any fears harbored by either the Commission or SAMHSA regarding KBHC's financial strength, **KBHC has made prepayment to Option Line for a full 12 months of services** for all phone numbers, including the suicide prevention hotlines. All of the parties to the contract have agreed that this prepayment will be sufficient to cover the service costs for all of KBHC's numbers, including the three disputed toll free numbers, based on previous call volumes and future projections. KBHC has already paid this amount in the belief that the Commission will order immediate reassignment of the three numbers back to KBHC. It

¹ Heartbeat International is a nonprofit organization that serves a national affiliation organization for pro-life pregnancy resource centers in the United States, Canada, and approximately forty other countries. Care Net is also a nonprofit organization that serves as a national affiliation organization for pro-life pregnancy resource centers in the United States and Canada. Option Line is a joint venture between Heartbeat International and Care Net, which provides callers with information about pregnancy and can refer callers to local pregnancy resource centers.

The Honorable Kevin J. Martin
June 6, 2008
Page Three

is thus clear beyond doubt that KBHC can continue to operate its current numbers for the foreseeable future, including 800-SUICIDE, 888-SUICIDE and 877-SUICIDA.

3. *KBHC Funding Is Secure*

KBHC's strong fundraising efforts ensure that KBHC will be able to operate the suicide prevention hotlines for the foreseeable future. KBHC, in partnership with several other organizations, including Post Secret, To Write Love on Her Arms, and Synclive, as well as repeat grants from BMS, Astra Zeneca, Pfizer, and Forrest Labs, has raised more than enough money to meet KBHC's current and future funding needs. Indeed, over the upcoming summer months, KBHC plans to continue its Hope In Action Tour, which has raised more than \$100,000 a year for KBHC since it first began in 2003. KBHC is in strong financial shape, and prepared to reassume the burden of operating the suicide prevention hotlines as soon as the Commission orders them returned from SAMHSA's temporary guardianship.

Another indicator of KBHC's strong financial position is its continued operation of more than ten other mental health related toll free lines, including 1-800-SUICIDA, a Spanish language suicide prevention hotline.² All numbers have been operated continuously for as long as they have been assigned to KBHC. Furthermore, and as discussed above, KBHC has already paid its telephony service providers for a full year of service for these numbers, as well as for the numbers currently being operated by SAMHSA. The Commission should thus find that KBHC's finances are more than adequate to assure the continued operation of the suicide prevention hotline numbers currently being operated by SAMSHA.

Conclusion

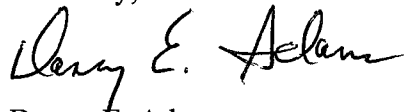
In conclusion, KBHC has clearly demonstrated in this docket its financial strength and its intent to continue to provide high quality service to its callers. There is nothing in the record to suggest that KBHC is unfit or unable to operate the network, and, as such, the Commission must return the numbers to it as requested in the Application for Review. KBHC is eager to work with the Commission and with SAMHSA to ensure the smooth transition of the numbers back to KBHC, and is happy to answer any questions the Commission may have of it.

² Other numbers currently operated by KBHC include: (800) 442-4673 [800.442.HOPE]; (877) 838-2838 [977.VET2VET]; (800) 722-9498; (800) 827-7571; (866) 771-1276; (866) 968-8454 [866.YOUTHLINE]; (888)861-8460; (877) 495-0009; (800) 472-3457 [800.GRADHLP]; (877) 472-3457 [800.GRADHLP]; (800)773-6667 [800.PPD.MOMS].

KELLEY DRYE & WARREN LLP

The Honorable Kevin J. Martin
June 6, 2008
Page Four

Sincerely,

A handwritten signature in black ink, appearing to read "Danny E. Adams". The signature is fluid and cursive, with the first name "Danny" and last name "Adams" clearly legible.

Danny E. Adams
Counsel for the Kristin Books Hope Center

cc: Michael J. Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor Tate, Commissioner
Robert M. McDowell, Commissioner
Dana Shaffer, Wireline Competition Bureau Chief